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7 Attorneys for Defendants, County of San Bernardino, Robert Vaccari, and Jake Adams

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

11 L.C., a minor by and through her
12 guardian *ad litem* Maria Cadena,
13 individually and as successor-in-interest
14 to Hector Puga; I.H., a minor by and
15 through his guardian *ad litem* Jasmine
16 Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA
SALAS UBALDO, individually,

Plaintiffs.

19 | VS

20 STATE OF CALIFORNIA; COUNTY
21 OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAIAH KEE;
22 MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
23 ROBERT VACCARI; JAKE ADAMS,
and DOES 6-10, inclusive,

Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 3*

**DECLARATION OF AMY R.
MARGOLIES, ESQ. IN SUPPORT
OF COUNTY DEFENDANTS'
NOTICE OF MOTION AND
MOTION IN LIMINE NO. 4 TO
EXCLUDE "SAL'S"
UNAUTHENTICATED BLACK &
WHITE SUREVEILLANCE VIDEO**

1 **DECLARATION OF AMY R. MARGOLIES**

2 I, Amy R. Margolies, declare as follows:

3 1. I am an attorney at law duly authorized to practice before this Court and
4 am a partner with Lynberg & Watkins, attorneys for Defendants County of San
5 Bernardino, Robert Vaccari, and Jake Adams in this action. I have personal
6 knowledge of the facts stated herein, except those stated upon information and belief,
7 and as to those matters, I believe them to be true. If called upon to testify to the
8 matters herein, I could and would competently do so.

9 2. Attached hereto as Exhibit "A" is a true and correct copy of "Sal's" (last
10 name unknown) black and white video of the incident¹.

11 3. Attached hereto as Exhibit "B" is a true and correct copy of Plaintiffs'
12 Opposition to County's Ex Parte to Extend Discovery Cutoff.

13 4. Attached hereto as Exhibit "C" is a true and correct copy of the email
14 correspondence between Defense counsel and Plaintiffs' counsel re Plaintiff
15 Correspondence re Refusal to Stipulate, Defendant Correspondence re Request
16 Reconsideration, and Plaintiff Correspondence re Continued Refusal to Stipulate .

17 5. Attached hereto as Exhibit "D" is a true and correct copy of the County's
18 Ex Parte to Reconsider for Single Deposition.

19 6. On January 21, 2025 Defendants served Plaintiffs' counsel with an
20 amended notice of deposition for "Sal" that was to occur on January 30, 2025 but
21 "Sal" never appeared for the noticed deposition.

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26 ¹ In order to play "Sal's" video, media player is needed to view and listen as the
27 VLC player will only play audio.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the above statement is true and correct. Executed this 17th day of April,
3 2025 in Orange, California.

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5 */s/ Amy R. Margolies*
6 DECLARANT
AMY R. MARGOLIES

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28 DECLARATION OF AMY R. MARGOLIES, ESQ. IN SUPPORT OF
COUNTY DEFENDANTS' NOTICE OF MOTION AND MOTION IN
LIMINE NO. 4 TO EXCLUDE "SAL'S" UNAUTHENTICATED BLACK &
WHITE SUREVEILLANCE VIDEO